

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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DURACELL U.S. OPERATIONS, INC., : 1:19- Civ. 03820  
A Delaware Corporation :  
Plaintiff, : **STIPULATION TO EXTEND  
TIME FOR DEFENDANTS  
TO RESPOND TO  
PLAINTIFF'S COMPLAINT**  
against :  
MY IMPORTS USA LLC, a New Jersey Limited :  
Liability Company, MY IMPORT USA INC., a New :  
Jersey Corporation, MANSUR MAQSUDI (a/k/a :  
Mansur Maq), an individual, JIAN YANG ZHANG :  
(a/k/a Kevin Zhang), an individual; :  
: :  
Defendant(s). :  
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IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys that Defendant Jian Yang Zhang (a/k/a Kevin Zhang) and Defendant My Import USA Inc. (collectively "My Import Inc. Defendants") that the My Import Inc. Defendants hereby agree they have been duly served and submit to the personal jurisdiction of the Court, and may have additional time to answer or otherwise respond to Plaintiff's complaint. Therefore, the day for My Import Inc. Defendants to answer or otherwise respond to Plaintiff's complaint is extended from May 30, 2019 to July 1, 2019.

Good cause exists for this extension as defense counsel has just been retained in this case and requires time to become knowledgeable about the case to prepare an initial pleading.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for the My Import Inc. Defendants hereby attests that (1) this is the first request for an extension; (2) the content of this document is acceptable to all persons required to sign the document; (3) Plaintiff's counsel has concurred with the filing of this document; and (4) a record supporting this concurrence is available for inspection or production if so ordered.

Respectfully Submitted,

**LAW OFFICES OF MICHAEL V. CIBELLA, LLC**

DATED: May 28, 2019

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**REED SMITH LLP**

DATED: May 29, 2019

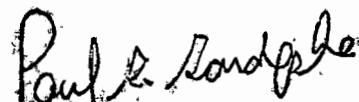
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**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendant Jian Yang Zhang (a/k/a Kevin Zhang) and Defendant My Import USA Inc. shall answer or otherwise respond to Plaintiff's complaint on or before Monday, July 1, 2019.

Dated: 5/30/19



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JUDGE PAUL G. GARDEPHE  
UNITED STATES DISTRICT COURT